

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
) CRIMINAL NO.: 05-M-0471-RBC
v.)
)
)
JANICE PIERRE)

JOINT MOTION FOR CONTINUANCE OF PRELIMINARY HEARING

The United States, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Seth P. Berman, and the defendant, by and through her attorney James Krasnoo, Esq., jointly move to continue the Preliminary Hearing currently scheduled for October 3, 2005 at 2:00 p.m. until November 30, 2005 at 10:30 a.m. As grounds therefore, the parties state that the parties need this additional time to discuss issues relating to the case, which could impact the government's charging decisions in this matter.

Respectfully Submitted,
JANICE PIERRE
By her attorney

/s/James Krasnoo
JAMES KRASNOO, ESQ.
978-475-9955

MICHAEL J. SULLIVAN
United States Attorney
By:

/s/ Seth P. Berman
SETH P. BERMAN
Assistant U.S. Attorney
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September 29, 2005